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August 5, 2020

BY ECF:

Hon. Ona T. Wang, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl St.,
New York, NY 10007

Re: Thomas Medina v. City of New York, et al.,
19 Civ. 9412 (AJN)

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, representing defendants City of New York, O'Neill, Monahan, Mukhtarzada, Hansler, Callan, Gallagher, Gomez, Nay Htoo, and Police Christopher Siciliano in the above-referenced matter. I write to respectfully request a one-week extension of time from August 5, 2020 until August 12, 2020, for the parties to serve their Initial Disclosures. Plaintiff's counsel, Alex Lesman, Esq., and co-defendant's counsel, James Moschella, Esq. consent to this request. This is defendants' first request for an extension of time for the parties to serve Initial Disclosures.

Due to the ongoing health crisis, a majority of the employees of the New York City Law Department continue to work from home. As a result, accessing certain documents and preparing disclosures has been delayed. A one-week extension will allow defendants the time to safely schedule a visit to the Office in order to retrieve certain hardcopy files. In addition, defendants are also requesting a one-week extension of time from August 5, 2020 until August 12, 2020, for the plaintiff and co-defendant to serve their Initial Disclosures.

Defendants thank Your Honor for your consideration herein and apologize for the late hour of this request.

Respectfully submitted,

/s/
Joseph Zangrilli

cc: All counsel of record via ECF